

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:)	
)	NOTICE OF VIOLATION
Vemco, Inc.)	
dba Venture Grand Rapids)	
Grand Rapids, Michigan)	EPA-5-01-MI-15
)	
)	
PROCEEDING PURSUANT TO SECTION)	
113(a)(1) OF THE CLEAN AIR ACT, AS)	
AMENDED, 42 U.S.C. § 7413(a)(1))	
_____)	

STATUTORY AUTHORITY

This Notice of Violation (NOV) is issued pursuant to Section 113(a)(1) of the Clean Air Act (Act), 42 U.S.C. Section 7413(a)(1). You are hereby notified that the Administrator of the United States Environmental Protection Agency (U.S. EPA), by authority duly delegated to the undersigned, hereby notifies Vemco, Inc. (Vemco) dba Venture Grand Rapids, that Vemco is in violation of the Michigan State Implementation Plan (SIP).

REGULATORY BACKGROUND

1. Michigan Air Pollution Control Commission Rule R336.1201 (Rule 201) was approved by the Administrator of the U.S. EPA on May 6, 1980 (45 Fed. Reg. 29790) as part of the federally enforceable SIP for Michigan.
2. Rule 201 sets forth the requirements for Permits to Install for, among other things, any process which may be a source of an air contaminant.
3. Rule 201(3) allows for the imposition of any conditions, specified in writing, that are necessary to assure compliance with these rules.
4. Michigan Air Pollution Control Commission Rule R336.1632 (Rule 632) was approved by the Administrator of the U.S. EPA on November 7, 1994 (59 Fed. Reg. 46182) as part of the federally enforceable SIP for Michigan.
5. Rule 632 sets forth the requirements for emission of volatile organic compounds (VOC) from existing automobile, truck, and business machine plastic part coating lines.
6. Rule 632(3)(a) prohibits a person from causing or allowing the emission of VOCs from the coating of plastic parts of automobiles and trucks from any existing coating lines in excess of the applicable emission rates as specified in table 66.

7. Table 66 specifies, among other things, the following VOC emission limitations for existing automobile and truck plastic parts coating lines after 12/31/92;

<u>Coating Category</u>	<u>Pounds of VOCs allowed to be emitted per gallon of coating (minus water) as applied</u>
Prime	
Flexible Coating	4.5
Topcoat	
Basecoat	4.3
Clearcoat	4.0

8. 40 C.F.R. § 52.23 states, in part, that failure to comply with any approved regulatory provision of a SIP, or with any permit condition issued pursuant to approved or promulgated regulations for the review of new or modified stationary or indirect sources, or with any permit limitation or condition contained within an operating permit issued under a U.S. EPA-approved program that is incorporated into the SIP, shall render the person so failing to comply in violation of a requirement of an applicable implementation plan and subject to enforcement action under Section 113 of the Clean Air Act.

SPECIFIC FINDINGS OF VIOLATION

9. Vemco, Inc. dba Venture Grand Rapids operates a plastic automobile parts coating facility, located at 5050 Kendrick Drive SE, Grand Rapids, Michigan.
10. The legal owner of the Venture Grand Rapid facility is Venture Holdings Corporation.
11. This facility operates three coating lines: a prime line and top coat line, which operate under Permit to Install No. 51-88A, issued on September 3, 1991 and revised on August 31, 1993; and a small parts/repair coating line, which operates under Permit to Install No. 838-90, issued on November 13, 1990.
12. Permit to Install No. 51-88A, Special Condition Number 16, requires that the VOC emission rate from the prime coat system not exceed 4.5 pounds per gallon of coating(minus water), as applied, based upon a 24-hour averaging period.
13. Vemco violated Permit to Install No. 51-88A, Special Condition Number 16, by exceeding the VOC emission rate of 4.5 pound per gallon of coating (minus water), as applied, emission limit from the prime coat system and Rule 632(3)(a). Violations of the 4.5 pound per gallon limit are listed on the following table:

Year	Month	Week	Day	Actual VOC Emission Rate lb/gal coating (minus water)	Permit limit VOC Emission Rate lb/gal coating (minus water)
1997	January	2	Tuesday	4.8	4.5
1997	January	2	Friday	4.6	4.5
1997	January	3	Tuesday	4.8	4.5
1997	January	3	Wednesday	4.7	4.5
1997	November	1	Friday	4.8	4.5
2000	January	2	Tuesday	4.8	4.5
2000	March	1	Wednesday	4.8	4.5
2000	April	1	Saturday	6.7	4.5
2000	September	4	Tuesday	4.7	4.5
2001	January	1	Tuesday	4.8	4.5
2001	January	1	Wednesday	4.9	4.5
2001	January	1	Friday	4.8	4.5
2001	January	2	Monday	4.8	4.5
2001	January	2	Tuesday	4.8	4.5
2001	January	2	Wednesday	4.8	4.5
2001	January	2	Thursday	4.8	4.5
2001	January	2	Friday	4.9	4.5
2001	January	3	Monday	4.9	4.5
2001	January	3	Tuesday	5.1	4.5
2001	January	3	Wednesday	4.6	4.5
2001	January	3	Thursday	4.9	4.5
2001	January	3	Friday	4.8	4.5
2001	January	4	Monday	4.7	4.5
2001	January	4	Tuesday	4.9	4.5
2001	January	4	Wednesday	4.6	4.5

14. Permit to Install No. 51-88A, Special Condition Number 17, requires that the VOC emission rate from the basecoat system not exceed 4.3 pounds per gallon of coating (minus water) as applied, based upon a 24-hour averaging period.
15. Vemco violated Permit to Install No. 51-88A, Special Condition Number 17 by exceeding the VOC permit limit of 4.3 pounds per gallon of coating (minus water), as applied, from the basecoat system, and Rule 632(3)(a) on Friday of the third week of July in 1999. The actual VOC emission rate from the basecoat system was 4.4 pounds per gallon (minus water), as applied.
16. Permit to Install No. 51-88A, Special Condition Number 18, requires that the VOC emission rate from the clearcoat system not exceed 4.0 pounds per gallon of coating (minus water) as applied, based upon a 24-hour averaging period.

17. Vemco violated Permit to Install, No. 51-88A, Special Condition Number 18, by exceeding the VOC permit limit of 4.0 pounds per gallon of clear coating (minus water) as applied, based upon a 24-hour averaging period on Friday of the second week of November in 1998, and Rule 632(3)(a). The actual VOC emission rate from the clearcoat system was 4.1 pounds per gallon of coating (minus water) as applied, based on a 24-hour averaging period.
18. Permit to Install No. 51-88A, Special Condition Number 33, requires that the VOC emission rate from the adhesion promoter process not exceed 25.3 pounds per hour nor 10 tons per year.
19. Vemco violated Permit to Install No. 51-88A, Special Condition Number 33, by exceeding the 10 ton per year VOC limit for adhesion promoter during the years of 1998, 1999, 2000 and 2001. The actual adhesion promoter emissions for these years are listed on the following table:

Year	Actual Annual Adhesion Promoter VOC Emissions	Permit limit for Annual Adhesion Promoter VOC Emissions
1998	27.2 tons	10 tons per year
1999	36.4 tons	10 tons per year
2000	43.9 tons	10 tons per year
2001	19.5 tons	10 tons per year

U.S. EPA issued an NOV for violations of the annual VOC emission rate for 1999 and 2000 in April 2001.

Additionally, Vemco violated Permit to Install No. 51-88A, Special Condition Number 33, by exceeding the Adhesion Promoter VOC limit of 25.3 pounds per hour as shown in the following table:

Year	Month	week	Day	Actual VOC pounds per hour (pph)	Permit VOC limit in pounds per hour
2000	November	3	Tuesday	25.7 pph	25.3 pph
2000	December	2	Wednesday	25.9 pph	25.3 pph
2001	January	3	Tuesday	26.6 pph	25.3 pph

20. Permit to Install No.838-90, Special Condition Number 14, requires that the VOC emission rate from the plastic parts repair painting process not exceed 13.6 pounds per hour nor 21.25 tons per year.

21. Vemco violated Permit to Install No.838-90, Special Condition Number 14, on a number of occasions. Violations of the 13.6 pounds per hour VOC limit are listed on the following table:

Year	Month	week	Day	Actual VOC Emission Rate in pounds per hour	Permit limit VOC Emission Rate in pounds per hour
1997	January	3	Monday	14.7	13.6
1997	December	1	Monday	13.7	13.6
1997	December	2	Monday	13.7	13.6
1997	December	2	Thursday	14.0	13.6
1998	February	2	Monday	18.3	13.6
1998	March	5	Tuesday	14.8	13.6
1998	April	4	Thursday	16.5	13.6
1998	May	4	Monday	13.7	13.6
1998	June	4	Friday	19.4	13.6
1998	September	1	Wednesday	17.1	13.6
1998	November	1	Monday	14.8	13.6
1998	November	2	Tuesday	25.1	13.6
1999	January	1	Monday	21.5	13.6
1999	March	2	Monday	13.7	13.6
1999	June	2	Monday	16.9	13.6
1999	June	3	Friday	15.2	13.6
1999	June	4	Monday	15.5	13.6
2001	June	3	Thursday	17.2	13.6
2001	September	2	Tuesday	15.3	13.6


22. Permit to Install 838-90, Special Condition Number 15, requires that the VOC emission rate from the basecoat repair painting process not exceed 33.8 pounds per gallon of solids applied, based upon a 24 hour averaging period.
23. Vemco violated Permit to Install 838-90, Special Condition Number 15, on numerous days. Days of violation are listed in Appendix A and the sum totals of these violations are as follows:
1. The VOC emission rate from the basecoat repair painting process exceeded the 33.8 pounds per gallon limit on 155 days in 1997. See attachment A.
 2. The VOC emission rate from the basecoat repair painting process exceeded the 33.8 pounds per gallon limit on 218 days in 1998. See attachment A.
 3. The VOC emission rate from the basecoat repair painting process exceeded the 33.8 pounds per gallon limit on 115 days in 1999. See attachment A.

24. In summary, Vemco violated the Michigan SIP by failing to comply with Special Conditions 16, 17, 18, and 33 of Permit to Install 51-88A, and Special Conditions 14 and 15 of Permit to Install 838-90 and Rule 632(3)(a) at its Grand Rapids, Michigan facility.

NOTICE OF VIOLATION

The Administrator of the U.S. EPA, by authority duly delegated to the undersigned, notifies the State of Michigan and Vemco that it is in violation of requirements of the applicable Michigan SIP as set forth in this Notice of Violation.

12-17-01
Date



Bharat Mathur, Director
Air and Radiation Division

ATTACHMENT A

Vemco Violations

Grand Rapids, Michigan

Permit 838-90, Special Condition Number 15

VOC Emissions from the Basecoat repair painting process

Year	Month	Day	Week	Actual VOC Emission Rate lb/gallon of solids applied	Permit Limits VOC Emission lb/gallon of solids applied
1997	January	Thursday	2	70.1 ppg	33.8 ppg
1997	January	Friday	2	70.1 ppg	33.8 ppg
1997	January	Monday	3	70.1 ppg	33.8 ppg
1997	January	Tuesday	3	70.1 ppg	33.8 ppg
1997	January	Wednesday	3	64.3 ppg	33.8 ppg
1997	January	Thursday	3	66.5 ppg	33.8 ppg
1997	January	Friday	3	52.7 ppg	33.8 ppg
1997	January	Monday	4	59.6 ppg	33.8 ppg
1997	January	Tuesday	4	48.8 ppg	33.8 ppg
1997	January	Wednesday	4	45.5 ppg	33.8 ppg
1997	January	Thursday	4	51.9 ppg	33.8 ppg
1997	January	Friday	4	38.6 ppg	33.8 ppg
1997	January	Monday	5	47.1 ppg	33.8 ppg
1997	January	Tuesday	5	39.2 ppg	33.8 ppg
1997	January	Wednesday	5	49.8 ppg	33.8 ppg
1997	January	Thursday	5	62.4 ppg	33.8 ppg
1997	January	Friday	5	46.9 ppg	33.8 ppg
1997	February	Monday	2	44.1 ppg	33.8 ppg
1997	February	Saturday	2	42.6 ppg	33.8 ppg

1997	February	Monday	3	41.6 ppg	33.8 ppg
1997	February	Tuesday	3	36.8 ppg	33.8 ppg
1997	February	Wednesday	3	44.2 ppg	33.8 ppg
1997	March	Saturday	1	53.9 ppg	33.8 ppg
1997	March	Monday	2	37.0 ppg	33.8 ppg
1997	March	Saturday	2	35.8 ppg	33.8 ppg
1997	March	Monday	3	39.4 ppg	33.8 ppg
1997	March	Tuesday	3	34.5 ppg	33.8 ppg
1997	March	Wednesday	3	34.4 ppg	33.8 ppg
1997	March	Friday	3	38.0 ppg	33.8 ppg
1997	March	Monday	4	65.1 ppg	33.8 ppg
1997	March	Wednesday	4	34.7 ppg	33.8 ppg
1997	March	Thursday	4	41.6 ppg	33.8 ppg
1997	March	Friday	4	42.0 ppg	33.8 ppg
1997	March	Saturday	4	38.7 ppg	33.8 ppg
1997	March	Tuesday	5	62.7 ppg	33.8 ppg
1997	March	Monday	6	34.6 ppg	33.8 ppg
1997	April	Tuesday	1	47.2 ppg	33.8 ppg
1997	April	Wednesday	1	44.8 ppg	33.8 ppg
1997	April	Thursday	1	35.5 ppg	33.8 ppg
1997	April	Saturday	1	67.6 ppg	33.8 ppg
1997	April	Thursday	2	39.4 ppg	33.8 ppg
1997	April	Friday	2	43.4 ppg	33.8 ppg
1997	April	Monday	3	38.2 ppg	33.8 ppg
1997	April	Tuesday	3	42.5 ppg	33.8 ppg
1997	April	Thursday	3	52.0 ppg	33.8 ppg
1997	April	Friday	3	42.5 ppg	33.8 ppg
1997	April	Tuesday	4	54.7 ppg	33.8 ppg

1997	April	Wednesday	4	67.4 ppg	33.8 ppg
1997	April	Tuesday	5	70.1 ppg	33.8 ppg
1997	April	Wednesday	5	67.7 ppg	33.8 ppg
1997	May	Monday	2	43.93 ppg	33.8 ppg
1997	May	Tuesday	2	70.06 ppg	33.8 ppg
1997	May	Wednesday	2	56.39 ppg	33.8 ppg
1997	May	Thursday	2	70.06 ppg	33.8 ppg
1997	May	Friday	2	70.06 ppg	33.8 ppg
1997	May	Monday	3	70.06 ppg	33.8 ppg
1997	May	Tuesday	3	70.06 ppg	33.8 ppg
1997	May	Thursday	5	50.22 ppg	33.8 ppg
1997	May	Friday	5	36.62 ppg	33.8 ppg
1997	June	Monday	1	43.4 ppg	33.8 ppg
1997	June	Tuesday	1	41.1 ppg	33.8 ppg
1997	June	Thursday	1	41.9 ppg	33.8 ppg
1997	June	Friday	1	35.9 ppg	33.8 ppg
1997	June	Monday	2	37.3 ppg	33.8 ppg
1997	June	Wednesday	2	41.2 ppg	33.8 ppg
1997	June	Friday	2	35.8 ppg	33.8 ppg
1997	June	Monday	3	42.2 ppg	33.8 ppg
1997	June	Wednesday	3	36.8 ppg	33.8 ppg
1997	June	Thursday	3	36.4 ppg	33.8 ppg
1997	June	Friday	3	44.3 ppg	33.8 ppg
1997	June	Monday	4	35.9 ppg	33.8 ppg
1997	June	Wednesday	4	43.5 ppg	33.8 ppg
1997	June	Thursday	4	37.4 ppg	33.8 ppg
1997	July	Monday	4	36.0 ppg	33.8 ppg
1997	July	Tuesday	4	39.4 ppg	33.8 ppg

1997	July	Wednesday	4	38.3 ppg	33.8 ppg
1997	July	Thursday	4	49.9 ppg	33.8 ppg
1997	July	Friday	4	34.6 ppg	33.8 ppg
1997	July	Monday	5	41.8 ppg	33.8 ppg
1997	July	Tuesday	5	35.6 ppg	33.8 ppg
1997	August	Monday	2	37.1 ppg	33.8 ppg
1997	August	Tuesday	2	35.8 ppg	33.8 ppg
1997	August	Thursday	2	35.8 ppg	33.8 ppg
1997	August	Tuesday	4	39.1 ppg	33.8 ppg
1997	August	Wednesday	4	34.8 ppg	33.8 ppg
1997	August	Thursday	4	36.0 ppg	33.8 ppg
1997	August	Friday	4	39.1 ppg	33.8 ppg
1997	August	Monday	5	63.9 ppg	33.8 ppg
1997	August	Tuesday	5	53.2 ppg	33.8 ppg
1997	August	Wednesday	5	63.9 ppg	33.8 ppg
1997	August	Thursday	5	47.0 ppg	33.8 ppg
1997	September	Tuesday	1	63.9 ppg	33.8 ppg
1997	September	Thursday	1	63.9 ppg	33.8 ppg
1997	September	Friday	1	63.9 ppg	33.8 ppg
1997	September	Saturday	1	63.9 ppg	33.8 ppg
1997	September	Monday	2	63.9 ppg	33.8 ppg
1997	September	Tuesday	2	63.9 ppg	33.8 ppg
1997	September	Wednesday	2	63.9 ppg	33.8 ppg
1997	September	Wednesday	3	63.9 ppg	33.8 ppg
1997	September	Thursday	3	63.9 ppg	33.8 ppg
1997	September	Friday	3	63.9 ppg	33.8 ppg
1997	September	Monday	4	63.9 ppg	33.8 ppg
1997	September	Tuesday	4	63.9 ppg	33.8 ppg

1997	September	Wednesday	4	63.9 ppg	33.8 ppg
1997	September	Thursday	4	63.9 ppg	33.8 ppg
1997	September	Friday	4	63.9 ppg	33.8 ppg
1997	September	Tuesday	5	63.9 ppg	33.8 ppg
1997	October	Wednesday	1	63.9 ppg	33.8 ppg
1997	October	Thursday	1	63.9 ppg	33.8 ppg
1997	October	Friday	1	63.9 ppg	33.8 ppg
1997	October	Tuesday	2	63.9 ppg	33.8 ppg
1997	October	Wednesday	2	63.9 ppg	33.8 ppg
1997	October	Thursday	2	63.9 ppg	33.8 ppg
1997	October	Friday	2	63.9 ppg	33.8 ppg
1997	October	Monday	3	54.9 ppg	33.8 ppg
1997	October	Tuesday	3	63.9 ppg	33.8 ppg
1997	October	Wednesday	3	63.9 ppg	33.8 ppg
1997	October	Thursday	3	43.5 ppg	33.8 ppg
1997	October	Monday	4	37.2 ppg	33.8 ppg
1997	October	Tuesday	4	63.9 ppg	33.8 ppg
1997	October	Wednesday	4	63.9 ppg	33.8 ppg
1997	October	Thursday	4	50.4 ppg	33.8 ppg
1997	October	Monday	5	51.9 ppg	33.8 ppg
1997	October	Tuesday	5	63.9 ppg	33.8 ppg
1997	October	Wednesday	5	61.9 ppg	33.8 ppg
1997	October	Thursday	5	56.6 ppg	33.8 ppg
1997	October	Friday	5	41.8 ppg	33.8 ppg
1997	November	Monday	2	63.9 ppg	33.8 ppg
1997	November	Tuesday	2	47.4 ppg	33.8 ppg
1997	November	Wednesday	2	63.9 ppg	33.8 ppg
1997	November	Thursday	2	63.9 ppg	33.8 ppg

1997	November	Friday	2	45.6 ppg	33.8 ppg
1997	November	Monday	3	38.4 ppg	33.8 ppg
1997	November	Wednesday	3	39.7 ppg	33.8 ppg
1997	November	Thursday	3	48.7 ppg	33.8 ppg
1997	November	Friday	3	63.9 ppg	33.8 ppg
1997	November	Monday	4	59.4 ppg	33.8 ppg
1997	November	Tuesday	4	43.5 ppg	33.8 ppg
1997	November	Wednesday	4	53.1 ppg	33.8 ppg
1997	November	Thursday	4	63.9 ppg	33.8 ppg
1997	November	Friday	4	41.7 ppg	33.8 ppg
1997	November	Monday	5	48.9 ppg	33.8 ppg
1997	November	Tuesday	5	48.8 ppg	33.8 ppg
1997	November	Wednesday	5	37.2 ppg	33.8 ppg
1997	December	Monday	1	49.8 ppg	33.8 ppg
1997	December	Tuesday	1	51.0 ppg	33.8 ppg
1997	December	Thursday	1	37.8 ppg	33.8 ppg
1997	December	Friday	1	38.0 ppg	33.8 ppg
1997	December	Monday	2	43.3 ppg	33.8 ppg
1997	December	Tuesday	2	34.5 ppg	33.8 ppg
1997	December	Wednesday	2	43.3 ppg	33.8 ppg
1997	December	Thursday	2	39.7 ppg	33.8 ppg
1997	December	Friday	2	42.4 ppg	33.8 ppg
1997	December	Tuesday	3	35.2 ppg	33.8 ppg
1997	December	Tuesday	5	63.9 ppg	33.8 ppg
1998	January	Tuesday	3	37.2 ppg	33.8 ppg
1998	January	Monday	4	46.5 ppg	33.8 ppg
1998	January	Tuesday	4	38.3 ppg	33.8 ppg
1998	January	Wednesday	4	47.9 ppg	33.8 ppg

1998	January	Thursday	4	36.0 ppg	33.8 ppg
1998	January	Friday	4	46.0 ppg	33.8 ppg
1998	January	Monday	5	35.7 ppg	33.8 ppg
1998	January	Tuesday	5	45.8 ppg	33.8 ppg
1998	January	Wednesday	5	39.0 ppg	33.8 ppg
1998	January	Thursday	5	49.1 ppg	33.8 ppg
1998	January	Friday	5	36.9 ppg	33.8 ppg
1998	January	Saturday	5	37.2 ppg	33.8 ppg
1998	February	Monday	1	36.6 ppg	33.8 ppg
1998	February	Tuesday	1	34.4 ppg	33.8 ppg
1998	February	Wednesday	1	39.8 ppg	33.8 ppg
1998	February	Thursday	1	35.1 ppg	33.8 ppg
1998	February	Friday	1	39.5 ppg	33.8 ppg
1998	February	Saturday	1	37.2 ppg	33.8 ppg
1998	February	Monday	2	49.2 ppg	33.8 ppg
1998	February	Tuesday	2	34.6 ppg	33.8 ppg
1998	February	Wednesday	2	36.5 ppg	33.8 ppg
1998	February	Friday	2	37.2 ppg	33.8 ppg
1998	February	Monday	3	48.0 ppg	33.8 ppg
1998	February	Wednesday	3	38.7 ppg	33.8 ppg
1998	February	Friday	3	45.3 ppg	33.8 ppg
1998	February	Saturday	3	63.9 ppg	33.8 ppg
1998	February	Monday	4	37.2 ppg	33.8 ppg
1998	February	Tuesday	4	50.5 ppg	33.8 ppg
1998	February	Wednesday	4	35.9 ppg	33.8 ppg
1998	February	Thursday	4	34.1 ppg	33.8 ppg
1998	February	Friday	4	44.1 ppg	33.8 ppg
1998	March	Monday	1	42.0 ppg	33.8 ppg

1998	March	Tuesday	1	36.4 ppg	33.8 ppg
1998	March	Wednesday	1	36.9 ppg	33.8 ppg
1998	March	Thursday	1	37.2 ppg	33.8 ppg
1998	March	Friday	1	45.1 ppg	33.8 ppg
1998	March	Monday	2	45.8 ppg	33.8 ppg
1998	March	Tuesday	2	36.8 ppg	33.8 ppg
1998	March	Wednesday	2	48.9 ppg	33.8 ppg
1998	March	Thursday	2	34.8 ppg	33.8 ppg
1998	March	Friday	2	36.0 ppg	33.8 ppg
1998	March	Saturday	2	34.8 pg	33.8 ppg
1998	March	Monday	3	42.7 ppg	33.8 ppg
1998	March	Tuesday	3	34.2 ppg	33.8 ppg
1998	March	Wednesday	3	36.3 ppg	33.8 ppg
1998	March	Thursday	3	43.1 ppg	33.8 ppg
1998	March	Friday	3	45.0 ppg	33.8 ppg
1998	March	Saturday	3	38.0 ppg	33.8 ppg
1998	March	Monday	4	38.7 ppg	33.8 ppg
1998	March	Wednesday	4	43.6ppg	33.8 ppg
1998	March	Thursday	4	42.1 ppg	33.8 ppg
1998	March	Friday	4	60.9 ppg	33.8 ppg
1998	March	Monday	5	49.0 ppg	33.8 ppg
1998	March	Tuesday	5	40.9 ppg	33.8 ppg
1998	April	Thursday	1	44.0 ppg	33.8 ppg
1998	April	Friday	1	44.3ppg	33.8 ppg
1998	April	Saturday	1	37.2 ppg	33.8 ppg
1998	April	Monday	2	41.1 ppg	33.8 ppg
1998	April	Tuesday	2	40.9 ppg	33.8 ppg
1998	April	Wednesday	2	34.5 ppg	33.8 ppg

1998	April	Thursday	2	37.2 ppg	33.8 ppg
1998	April	Monday	3	45.1 ppg	33.8 ppg
1998	April	Tuesday	3	35.7 ppg	33.8 ppg
1998	April	Wednesday	3	45.1 ppg	33.8 ppg
1998	April	Thursday	3	45.2 ppg	33.8 ppg
1998	April	Friday	3	40.6 ppg	33.8 ppg
1998	April	Monday	4	63.9 ppg	33.8 ppg
1998	April	Tuesday	4	45.7 ppg	33.8 ppg
1998	April	Wednesday	4	35.8 ppg	33.8 ppg
1998	April	Thursday	4	45.0 ppg	33.8 ppg
1998	April	Friday	4	37.2 ppg	33.8 ppg
1998	April	Monday	5	37.8 ppg	33.8 ppg
1998	April	Wednesday	5	52.9 ppg	33.8 ppg
1998	May	Friday	1	37.2 ppg	33.8 ppg
1998	May	Saturday	1	38.7 ppg	33.8 ppg
1998	May	Monday	2	46.0 ppg	33.8 ppg
1998	May	Wednesday	2	37.2 ppg	33.8 ppg
1998	May	Thursday	2	47.6 ppg	33.8 ppg
1998	May	Saturday	2	37.2 ppg	33.8 ppg
1998	May	Monday	3	63.9 ppg	33.8 ppg
1998	May	Tuesday	3	63.9 ppg	33.8 ppg
1998	May	Wednesday	3	38.7 ppg	33.8 ppg
1998	May	Thursday	3	47.2 ppg	33.8 ppg
1998	May	Friday	3	47.2 ppg	33.8 ppg
1998	May	Monday	4	49.4 ppg	33.8 ppg
1998	May	Tuesday	4	38.7 ppg	33.8 ppg
1998	May	Wednesday	4	37.2 ppg	33.8 ppg
1998	May	Thursday	4	39.5 ppg	33.8 ppg

1998	May	Friday	4	44.5 ppg	33.8 ppg
1998	May	Saturday	4	63.9 ppg	33.8 ppg
1998	May	Tuesday	5	55.8 ppg	33.8 ppg
1998	May	Wednesday	5	37.2 ppg	33.8 ppg
1998	May	Thursday	5	44.5 ppg	33.8 ppg
1998	May	Friday	5	43.1 ppg	33.8 ppg
1998	June	Monday	1	45.6 ppg	33.8 ppg
1998	June	Tuesday	1	39.6 ppg	33.8 ppg
1998	June	Wednesday	1	45.7 ppg	33.8 ppg
1998	June	Thursday	1	47.8 ppg	33.8 ppg
1998	June	Friday	1	44.0 ppg	33.8 ppg
1998	June	Monday	2	37.2 ppg	33.8 ppg
1998	June	Tuesday	2	51.9 ppg	33.8 ppg
1998	June	Wednesday	2	39.4 ppg	33.8 ppg
1998	June	Thursday	2	46.9 ppg	33.8 ppg
1998	June	Friday	2	39.1 ppg	33.8 ppg
1998	June	Monday	3	38.7 ppg	33.8 ppg
1998	June	Tuesday	3	43.9 ppg	33.8 ppg
1998	June	Wednesday	3	42.0 ppg	33.8 ppg
1998	June	Thursday	3	43.6 ppg	33.8 ppg
1998	June	Friday	3	41.3 ppg	33.8 ppg
1998	June	Monday	4	43.1 ppg	33.8 ppg
1998	June	Tuesday	4	37.2 ppg	33.8 ppg
1998	June	Thursday	4	37.2 ppg	33.8 ppg
1998	June	Friday	4	37.2 ppg	33.8 ppg
1998	July	Tuesday	2	38.7 ppg	33.8 ppg
1998	July	Thursday	4	38.7 ppg	33.8 ppg
1998	July	Friday	4	38.5 ppg	33.8 ppg

1998	July	Monday	5	37.2 ppg	33.8 ppg
1998	July	Tuesday	5	37.6 ppg	33.8 ppg
1998	July	Wednesday	5	37.3 ppg	33.8 ppg
1998	July	Thursday	5	37.2 ppg	33.8 ppg
1998	July	Friday	5	37.2 ppg	33.8 ppg
1998	August	Monday	1	38.5 ppg	33.8 ppg
1998	August	Tuesday	1	57.1 ppg	33.8 ppg
1998	August	Wednesday	1	39.2 ppg	33.8 ppg
1998	August	Thursday	1	54.3 ppg	33.8 ppg
1998	August	Friday	1	58.6 ppg	33.8 ppg
1998	August	Monday	2	58.6 ppg	33.8 ppg
1998	August	Tuesday	2	38.5 ppg	33.8 ppg
1998	August	Wednesday	2	58.6 ppg	33.8 ppg
1998	August	Thursday	2	53.2 ppg	33.8 ppg
1998	August	Friday	2	58.6 ppg	33.8 ppg
1998	August	Monday	3	58.6 ppg	33.8 ppg
1998	August	Tuesday	3	57.4 ppg	33.8 ppg
1998	August	Thursday	3	50.3 ppg	33.8 ppg
1998	August	Friday	3	58.6 ppg	33.8 ppg
1998	August	Monday	4	55.8 ppg	33.8 ppg
1998	August	Tuesday	4	47.2 ppg	33.8 ppg
1998	August	Wednesday	4	55.1 ppg	33.8 ppg
1998	August	Thursday	4	49.6 ppg	33.8 ppg
1998	August	Friday	4	54.6 ppg	33.8 ppg
1998	August	Monday	5	53.0 ppg	33.8 ppg
1998	September	Tuesday	1	54.9 ppg	33.8 ppg
1998	September	Wednesday	1	39.3 ppg	33.8 ppg
1998	September	Thursday	1	43.7 ppg	33.8 ppg

1998	September	Friday	1	40.1 ppg	33.8 ppg
1998	September	Tuesday	2	48.4 ppg	33.8 ppg
1998	September	Wednesday	2	40.6pg	33.8 ppg
1998	September	Thursday	2	42.3 ppg	33.8 ppg
1998	September	Friday	2	44.6 ppg	33.8 ppg
1998	September	Monday	3	52.8 ppg	33.8 ppg
1998	September	Tuesday	3	37.3 ppg	33.8 ppg
1998	September	Wednesday	3	41.9 ppg	33.8 ppg
1998	September	Thursday	3	38.0 ppg	33.8 ppg
1998	September	Friday	3	59.2 ppg	33.8 ppg
1998	September	Monday	4	53.1 ppg	33.8 ppg
1998	September	Tuesday	4	48.3 ppg	33.8 ppg
1998	September	Wednesday	4	50.0 ppg	33.8 ppg
1998	September	Thursday	4	60.5 ppg	33.8 ppg
1998	September	Friday	4	63.9 ppg	33.8 ppg
1998	September	Monday	5	37.9 ppg	33.8 ppg
1998	September	Tuesday	5	37.3 ppg	33.8 ppg
1998	September	Wednesday	5	43.6 ppg	33.8 ppg
1998	October	Thursday	1	37.8 ppg	33.8 ppg
1998	October	Friday	1	58.2 ppg	33.8 ppg
1998	October	Monday	2	58.2 ppg	33.8 ppg
1998	October	Tuesday	2	43.9 ppg	33.8 ppg
1998	October	Wednesday	2	44.1ppg	33.8 ppg
1998	October	Thursday	2	47.5 ppg	33.8 ppg
1998	October	Friday	2	58.2 ppg	33.8 ppg
1998	October	Monday	3	37.3 ppg	33.8 ppg
1998	October	Tuesday	3	37.9 ppg	33.8 ppg
1998	October	Wednesday	3	37.4ppg	33.8 ppg

1998	October	Thursday	3	37.8 ppg	33.8 ppg
1998	October	Friday	3	58.2 ppg	33.8 ppg
1998	October	Monday	4	49.1 ppg	33.8 ppg
1998	October	Tuesday	4	48.8 ppg	33.8 ppg
1998	October	Wednesday	4	44.8 ppg	33.8 ppg
1998	October	Thursday	4	42.2 ppg	33.8 ppg
1998	October	Friday	4	58.2 ppg	33.8 ppg
1998	October	Monday	5	48.6 ppg	33.8 ppg
1998	October	Tuesday	5	46.2 ppg	33.8 ppg
1998	October	Wednesday	5	45.5 ppg	33.8 ppg
1998	October	Thursday	5	41.1 ppg	33.8 ppg
1998	October	Friday	5	58.2 ppg	33.8 ppg
1998	November	Monday	1	51.5 ppg	33.8 ppg
1998	November	Tuesday	1	38.5 ppg	33.8 ppg
1998	November	Wednesday	1	37.6 ppg	33.8 ppg
1998	November	Thursday	1	38.2 ppg	33.8 ppg
1998	November	Friday	1	37.7 ppg	33.8 ppg
1998	November	Monday	2	37.2 ppg	33.8 ppg
1998	November	Tuesday	2	57.3 ppg	33.8 ppg
1998	November	Wednesday	2	48.7 ppg	33.8 ppg
1998	November	Thursday	2	47.0 ppg	33.8 ppg
1998	November	Friday	2	45.0 ppg	33.8 ppg
1998	November	Monday	3	47.4 ppg	33.8 ppg
1998	November	Tuesday	3	42.6 ppg	33.8 ppg
1998	November	Wednesday	3	49.4 ppg	33.8 ppg
1998	November	Thursday	3	45.6 ppg	33.8 ppg
1998	November	Friday	3	59.1 ppg	33.8 ppg
1998	November	Saturday	3	63.9 ppg	33.8 ppg

1998	November	Monday	4	47.4 ppg	33.8 ppg
1998	November	Tuesday	4	63.9 ppg	33.8 ppg
1998	November	Wednesday	4	37.2 ppg	33.8 ppg
1998	November	Monday	5	43.1 ppg	33.8 ppg
1998	December	Tuesday	1	56.4 ppg	33.8 ppg
1998	December	Wednesday	1	36.6 ppg	33.8 ppg
1998	December	Thursday	1	48.3 ppg	33.8 ppg
1998	December	Friday	1	57.0 ppg	33.8 ppg
1998	December	Monday	2	58.3 ppg	33.8 ppg
1998	December	Tuesday	2	62.3 ppg	33.8 ppg
1998	December	Wednesday	2	45.8 ppg	33.8 ppg
1998	December	Thursday	2	37.2 ppg	33.8 ppg
1998	December	Friday	2	63.9 ppg	33.8 ppg
1998	December	Tuesday	3	54.4 ppg	33.8 ppg
1998	December	Wednesday	3	63.9 ppg	33.8 ppg
1998	December	Thursday	3	63.9 ppg	33.8 ppg
1998	December	Friday	3	63.9 ppg	33.8 ppg
1998	December	Monday	4	47.0 ppg	33.8 ppg
1999	January	Monday	1	41.8 ppg	33.8 ppg
1999	January	Tuesday	1	37.2 ppg	33.8 ppg
1999	January	Wednesday	1	48.5 ppg	33.8 ppg
1999	January	Thursday	1	37.2 ppg	33.8 ppg
1999	January	Friday	1	49.7 ppg	33.8 ppg
1999	January	Monday	2	52.0 ppg	33.8 ppg
1999	January	Tuesday	2	37.2 ppg	33.8 ppg
1999	January	Wednesday	2	45.3 ppg	33.8 ppg
1999	January	Thursday	2	50.6 ppg	33.8 ppg
1999	January	Friday	2	55.4 ppg	33.8 ppg

1999	January	Monday	3	41.6 ppg	33.8 ppg
1999	January	Tuesday	3	37.2 ppg	33.8 ppg
1999	January	Wednesday	3	37.2 ppg	33.8 ppg
1999	January	Thursday	3	37.2 ppg	33.8 ppg
1999	January	Friday	3	54.8 ppg	33.8 ppg
1999	January	Saturday	3	37.2 ppg	33.8 ppg
1999	January	Monday	4	44.6 ppg	33.8 ppg
1999	January	Tuesday	4	44.7 ppg	33.8 ppg
1999	January	Wednesday	4	46.3 ppg	33.8 ppg
1999	January	Thursday	4	43.5 ppg	33.8 ppg
1999	January	Friday	4	38.8 ppg	33.8 ppg
1999	February	Monday	1	47.4 ppg	33.8 ppg
1999	February	Tuesday	1	43.2 ppg	33.8 ppg
1999	February	Wednesday	1	46.1 ppg	33.8 ppg
1999	February	Thursday	1	48.1 pg	33.8 ppg
1999	February	Friday	1	38.7 ppg	33.8 ppg
1999	February	Monday	2	43.1 ppg	33.8 ppg
1999	February	Tuesday	2	43.5 ppg	33.8 ppg
1999	February	Wednesday	2	37.2 ppg	33.8 ppg
1999	February	Thursday	2	44.8 pg	33.8 ppg
1999	February	Friday	2	37.5 ppg	33.8 ppg
1999	February	Saturday	2	48.2 ppg	33.8 ppg
1999	February	Monday	3	56.2 ppg	33.8 ppg
1999	February	Tuesday	3	37.6 ppg	33.8 ppg
1999	February	Wednesday	3	37.4 ppg	33.8 ppg
1999	February	Thursday	3	48.6 pg	33.8 ppg
1999	February	Friday	3	37.5 ppg	33.8 ppg
1999	February	Monday	4	45.3 ppg	33.8 ppg

1999	February	Tuesday	4	37.2 ppg	33.8 ppg
1999	February	Wednesday	4	43.6 ppg	33.8 ppg
1999	February	Thursday	4	45.7 pg	33.8 ppg
1999	February	Friday	4	42.5 ppg	33.8 ppg
1999	March	Monday	1	40.6 ppg	33.8 ppg
1999	March	Tuesday	1	43.1 ppg	33.8 ppg
1999	March	Wednesday	1	41.6 ppg	33.8 ppg
1999	March	Thursday	1	43.4 pg	33.8 ppg
1999	March	Friday	1	46.6 ppg	33.8 ppg
1999	March	Saturday	1	37.2 ppg	33.8 ppg
1999	March	Monday	2	51.5 ppg	33.8 ppg
1999	March	Tuesday	2	44.3 ppg	33.8 ppg
1999	March	Wednesday	2	43.2 ppg	33.8 ppg
1999	March	Thursday	2	40.7 pg	33.8 ppg
1999	March	Friday	2	47.6 ppg	33.8 ppg
1999	March	Monday	3	46.8 ppg	33.8 ppg
1999	March	Tuesday	3	49.0 ppg	33.8 ppg
1999	March	Wednesday	3	37.6 ppg	33.8 ppg
1999	March	Thursday	3	37.2 pg	33.8 ppg
1999	March	Friday	3	37.8 ppg	33.8 ppg
1999	March	Monday	4	38.0 ppg	33.8 ppg
1999	March	Tuesday	4	47.0 ppg	33.8 ppg
1999	March	Wednesday	4	41.7 ppg	33.8 ppg
1999	April	Thursday	1	37.2 ppg	33.8 ppg
1999	April	Monday	2	38.8 ppg	33.8 ppg
1999	April	Tuesday	2	43.0 ppg	33.8 ppg
1999	April	Wednesday	2	44.4 ppg	33.8 ppg
1999	April	Thursday	2	45.6 ppg	33.8 ppg

1999	April	Friday	2	38.2 ppg	33.8 ppg
1999	April	Monday	3	41.0 ppg	33.8 ppg
1999	April	Tuesday	3	43.8 ppg	33.8 ppg
1999	April	Wednesday	3	44.1 ppg	33.8 ppg
1999	April	Thursday	3	37.2 ppg	33.8 ppg
1999	April	Friday	3	50.0 ppg	33.8 ppg
1999	April	Monday	4	43.3 ppg	33.8 ppg
1999	April	Tuesday	4	39.7 ppg	33.8 ppg
1999	April	Wednesday	4	48.2 ppg	33.8 ppg
1999	April	Thursday	4	48.2 ppg	33.8 ppg
1999	April	Friday	4	38.0 ppg	33.8 ppg
1999	April	Monday	5	47.7 ppg	33.8 ppg
1999	April	Tuesday	5	37.2 ppg	33.8 ppg
1999	April	Wednesday	5	48.5 ppg	33.8 ppg
1999	April	Thursday	5	37.2 ppg	33.8 ppg
1999	April	Friday	5	49.0 ppg	33.8 ppg
1999	May	Monday	1	44.5 ppg	33.8 ppg
1999	May	Wednesday	1	36.9 ppg	33.8 ppg
1999	May	Monday	2	42.6 ppg	33.8 ppg
1999	May	Tuesday	2	34.9 ppg	33.8 ppg
1999	May	Thursday	2	40.1 ppg	33.8 ppg
1999	May	Monday	3	36.2 ppg	33.8 ppg
1999	May	Tuesday	3	36.0 ppg	33.8 ppg
1999	May	Wednesday	3	36.9 ppg	33.8 ppg
1999	May	Thursday	3	36.9 ppg	33.8 ppg
1999	May	Monday	4	47.0 ppg	33.8 ppg
1999	June	Wednesday	1	43.7 ppg	33.8 ppg
1999	June	Thursday	1	40.3 ppg	33.8 ppg

1999	June	Friday	1	38.1 ppg	33.8 ppg
1999	June	Monday	2	49.8 ppg	33.8 ppg
1999	June	Tuesday	2	39.2 ppg	33.8 ppg
1999	June	Wednesday	2	36.9 ppg	33.8 ppg
1999	June	Thursday	2	36.4 ppg	33.8 ppg
1999	June	Friday	2	41.9 ppg	33.8 ppg
1999	June	Saturday	2	42.9 ppg	33.8 ppg
1999	June	Monday	3	39.4 ppg	33.8 ppg
1999	June	Tuesday	3	42.4 ppg	33.8 ppg
1999	June	Wednesday	3	40.3 ppg	33.8 ppg
1999	June	Thursday	3	37.5 ppg	33.8 ppg
1999	June	Friday	3	48.9 ppg	33.8 ppg
1999	June	Monday	4	38.4 ppg	33.8 ppg
1999	June	Tuesday	4	42.6 ppg	33.8 ppg
1999	June	Wednesday	4	34.7 ppg	33.8 ppg
1999	June	Thursday	4	37.0 ppg	33.8 ppg
1999	June	Friday	4	35.1 ppg	33.8 ppg
1999	June	Monday	5	36.7 ppg	33.8 ppg
1999	June	Tuesday	5	35.1 ppg	33.8 ppg
1999	June	Wednesday	5	35.7 ppg	33.8 ppg
1999	July	Thursday	1	37.5 ppg	33.8 ppg

CERTIFICATE OF MAILING

I, Shanee Rucker, certify that I sent a Notice of Violation, EPA-5-01-MI-15, by Certified Mail, Return Receipt Requested, to:

Mike Austin, General Manager
Vemco, Inc. dba Venture Grand Rapids
5050 Kendrick Street, SE
Grand Rapids, Michigan 49512

I also certify that I sent copies of the Notice of Violation by first class mail to:

Cal Peters
Grand Rapids District
State Office Building, 6th Floor
350 Ottawa N.W.
Grand Rapids, Michigan 49503

Heidi Hollenbach
Grand Rapids District
State Office Building, 6th Floor
350 Ottawa N.W.
Grand Rapids, Michigan 49503

Timothy McGarry
Michigan Department of Environmental Quality
Air Quality Division
P.O. Box 30260
Lansing, Michigan 48909

Gerald Avery
Michigan Department of Environmental Quality
Air Quality Division
P.O. Box 30260
Lansing, Michigan 48909

on the 17th day of December, 2001.

Shanee Rucker
Shanee Rucker, Secretary
AECAS (MI/WI)

CERTIFIED MAIL RECEIPT NUMBER: 70993400000095863481